UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

BUDIMIR DAMNJANOVIC and
DESANKA DAMNJANOVIC,

Plaintiffs,

v.

Civil No. 14-11920
HON. LINDA V. PARKER
MAG. J. MONA K. MAJZOUB

UNITED STATES DEPARTMENT OF THE AIR FORCE, SECRETARY DEBORAH LEE JAMES, *in her official capacity*, UNITED STATES DEPARTMENT OF DEFENSE, SECRETARY CHARLES T. HAGEL, *in his official capacity*, and UNITED STATES OF AMERICA,

Defendants.
____/

STIPULATION FOR ENTRY OF JUDGMENT

In order to settle the present action, the parties, as represented by the signatures of their counsel below, jointly stipulate as follows:

1. Plaintiffs' Complaint and Jury Demand (the Complaint) in this action was filed on May 14, 2014. Count 1 of the Complaint alleges damages under 35 U.S.C. § 183, based on the U.S. Patent and Trademark Office's imposition of a Secrecy Order (recommended by the U.S. Department of the Air Force) on U.S. Patent Application No. 11/881,492 (the '492

Application), which is owned and was filed by Plaintiffs. The remaining counts of the Complaint, Counts 2, 3, and 4, were previously dismissed by the Court's Order of September 22, 2015.

2. Plaintiffs have submitted a written offer to Defendants (the Government) to settle this action by dismissing with prejudice all claims in the Complaint as well as all claims that were, or could have been, brought in the Complaint, up to the date this Court enters judgment.

3. The Government has duly agreed to accept this offer.

4. In consideration for the Plaintiffs' offer to dismiss this action with prejudice, the Government, in turn, has also agreed that judgment in this action to be entered in favor of Plaintiffs and against the Government for the total lump sum of Sixty-Three Thousand Dollars ($63,000.00).

5. In accordance with the terms of the Plaintiffs' offer and the Government's acceptance and to secure the performance thereof, the parties enter into this Stipulation to be filed in the above-identified action for the purpose of causing a final judgment to be entered against the Government in accordance with the terms set forth above.

6. The Government also reserves all defenses and arguments in any future litigation involving the '492 Application and any patents issuing from it.

7. The parties agree to bear their own costs and attorneys' fees.

8. In the event that the Court declines to enter judgment in accordance with this stipulation, in whole or in part, the stipulation shall be void.

Dated: December 1, 2015

EPIC Law PLLC
/s/ Hattem Beydoun (with consent)

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Respectfully submitted,

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s/Walter W. Brown
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Attorneys for Defendants

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____/

ORDER ENTERING JUDGMENT

In accordance with the terms of the foregoing stipulation, it is **ORDERED** that judgment is entered against Defendants for the total lump sum of $63,000.

SO ORDERED

s/ Linda V. Parker
LINDA V. PARKER
U.S. DISTRICT JUDGE

Dated: December 1, 2015